

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**KULP MINERALS LLC,**

**Plaintiff,**

**Civ. No. 2:23-408-KG-KRS**

**v.**

**APACHE CORPORATION,**

**Defendant.**

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL**

Lisa Baldwin, attorney of record for Plaintiff, Kulp Minerals LLC, respectfully moves to withdraw as counsel of record. In support of this Motion, Counsel states:

1. Plaintiff has been represented by Lisa Baldwin of Nix Patterson, LLP.
2. Effective February 28, 2025, Lisa Baldwin is departing from Nix Patterson, LLP.

Therefore, it is necessary for her to withdraw as counsel of record for Plaintiff.

3. Plaintiff will continue to be represented by Bradley Beckworth, Drew Pate, Susan Whatley, Trey Duck, and Nathan Hall of Nix Patterson, LLP, along with Andrew Stout and Mark Stout of Stout & Stout, and Jason A. Ryan, Patrick M. Ryan, and Paula M. Jantzen of Ryan Whaley Coldiron Jantzen Peters & Webber PLLC.

4. Counsel for Defendant was contacted regarding this motion, and they are unopposed to its filing.

5. A proposed Order allowing the withdrawal of Lisa Baldwin is submitted with this motion.

DATED: April 3, 2025

Respectfully submitted,

By: /s/ Lisa Baldwin

Bradley E. Beckworth

Trey Duck

Drew Pate

Lisa Baldwin

Susan Whatley

**NIX PATTERSON, LLP**

8701 Bee Cave Rd

Building 1, Suite 500

Austin, TX 78746

Telephone: (512) 328-5333

Facsimile: (512) 328-5335

*bbeckworth@nixlaw.com*

*tduck@nixlaw.com*

*dpate@nixlaw.com*

*lbaldwin@nixlaw.com*

*swhatley@nixlaw.com*

Mark Stout

Drew Stout

**STOUT & STOUT LAWYERS LLP**

3319 A North Grimes

Hobbs, NM 88240

Telephone: (575) 393-1555

Facsimile: (575) 393-1825

*mark@stoutnm.com*

*drew@stoutnm.com*

Bradley E. Beckworth

Trey Duck

Drew Pate

Lisa Baldwin

Susan Whatley

**NIX PATTERSON, LLP**

8701 Bee Cave Rd

Building 1, Suite 500

Austin, TX 78746

Telephone: (512) 328-5333

Facsimile: (512) 328-5335

*bbeckworth@nixlaw.com*

*tduck@nixlaw.com*

*dpate@nixlaw.com*

*lbaldwin@nixlaw.com*

*swhatley@nixlaw.com*

Patrick M. Ryan  
Jason A. Ryan  
Paula M. Jantzen  
**RYAN WHALEY PLLC**  
400 N. Walnut Avenue  
Oklahoma City, OK 73104  
Telephone: (405) 239-6040  
Facsimile: (405) 239-6766  
*pryan@ryanwhaley.com*  
*jryan@ryanwhaley.com*  
*pjantzen@ryanwhaley.com*

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2025 a true and correct copy of the foregoing document was filed and served electronically in compliance with Fed. R. Civ. P. 5(b)(2)(E) by using the Court's CM/ECF filing service and causing it to be served via electronic mail on all counsel of record.

/s/ Lisa Baldwin  
Lisa Baldwin